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By ECF

May 1, 2019

Hon. Vernon Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Great Western Ins. Co. v. Mark Graham et. al.* (No. 18-cv-6249 (VSB))
Request for Further Extension of Time to Answer or Move

Your Honor:

I represent Defendant Gregory Tolaram. With apologies to Your Honor, I write again to request the Court's approval for a further extension of time for Mr. Tolaram to answer or move against the Second Amended Complaint. The original deadline was March 15, 2019. On April 1st, this Court granted an extension until May 1st (Doc. No. 150), considering the parties being actively engaged in settlement discussions to resolve this matter on mutually agreeable terms (as explained in my letter of March 29, 2019 [Doc. No. 149]). At the time of my March 29th letter, we did not expect that more time would be required to determine if the parties are able to reach a settlement, but due to conflicting demands on time and various unexpected deadlines, settlement negotiations are still ongoing. Thus, I respectfully request a further two-week extension of time for Mr. Tolaram to answer or move. Gerard Kelly, lead counsel for Great Western, has agreed to and consents to this extension of time.

Respectfully submitted,

/s/ Andy S. Oh
Andy S. Oh